

REMARKS

This Amendment is in response to the Office Action of June 25, 2007 in which claims 1-29 were rejected.

With reference to the Examiner's rejection of claim 23, the claim has been amended in accordance with U.S. practice. Withdrawal of the 35 U.S.C. 101 rejection is requested.

Claim 24 has been amended so as to correct a typographical error. The term "routing" was missing from the 6th line of claim 24 and has been inserted so as to specify "for transferring location dependent routing information". The means-plus-function language has also been removed from this claim as well as from claims 7, 11, 23, 25, 26, 27 and 28.

In addition to the aforementioned amendments, preambles of the current independent claims have been amended so as to shorten same.

Having regard to the prior art objections raised in the Office Action, we provide the following remarks:

The U.S. Examiner has raised prior art objections based on US 6,847,822 (*Dennison*), U.S. 7,162,237 (*Silver*), U.S. 6,085,085 (*Blakeney*) and U.S. 6,819,921 (*Mazzarella*).

Applicants believe that none of the four cited documents disclose the presently claimed invention.

The presently claimed invention specifies that location dependent routing information is stored in a data storage. The location dependent routing information stored in a data storage is then provided to a terminal and a connection is established between the terminal and at least one other terminal using the location

dependent routing information provided by the data storage, wherein at least one of the terminals is a mobile terminal and the information for routing the connection between the terminals is selected based on the location of the at least one mobile terminal.

Dennison relates to performing routing based on the location of a mobile terminal. However, *Dennison* does not disclose providing a terminal with location dependent routing information stored in a data storage. Rather, *Dennison* appears to disclose storing location dependent routing information in a data storage of a communication system, determining a route for a connection based on the stored location dependent routing information in the system and location information for a mobile terminal, and then sending a command to the mobile terminal to establish a connection based on this determination. All the location dependent routing information is retained within a network entity rather than being provided to the mobile terminal in *Dennison*. Only location information and a command to establish a new connection is transferred between the mobile terminal and the network. No location dependent routing information is provided to the mobile terminal.

One problem with the arrangement disclosed in *Dennison* is that any call originating from the mobile terminal will initially be sent to a network entity with, for example, the best signal strength, regardless of the location of the mobile terminal. This is the case because the mobile terminal in *Dennison* is not provided with any location dependent routing information. Only then can the network entity determine the appropriate routing for the connection based on stored location dependent routing information and subsequently send a command to the mobile terminal to make a new connection to a different network if appropriate.

The presently claimed invention differs from *Dennison* in that location dependent routing information is provided to a terminal and that this information can be used to route calls from the terminal to another terminal. Such an arrangement is advantageous when, for example, the terminal is roaming in a

visited network, such as terminal 12 in network 11 of Figure 4 in the present application. Terminal 12 may be provided with routing information when located in network 11 such that calls are routed via access point 14 and through IP network 10 in order to form a connection to terminal 2 in network 1.

The provision of location dependent routing information to a terminal for routing calls is neither disclosed nor suggested in *Dennison*. Rather, *Dennison* only discloses sending location information to a network entity, the network entity then determines routing information based on the location of the terminal. Thus, the arrangement in *Dennison* cannot control the routing of the initial connection from the terminal to the control entity according to the location of the terminal. Independent claim 24 is distinguished over *Dennison* for the same reasons. We note that the sixth line of original claim 24 recited the feature of transferring location dependent information. This should read "transferring location dependent routing information". Accordingly, the term "routing" has been inserted into this portion of claim 24.

Independent claim 25 which is directed to a mobile terminal is distinguished over the cited document in that it specifies an input device for input of location dependent routing information and a connection establishing device for initiating establishment of a connection based on this location dependent routing information. The terminal in *Dennison* does not receive any location dependent routing information and does not establish a connection based on location dependent routing information. Rather, the terminal in *Dennison* merely sends location information to a network entity which then uses the information to determine a suitable route for a call.

Independent claim 29 which is directed to a routing server is distinguished over *Dennison* in specifying that location dependent routing information is transmitted from the routing server to the terminal. In *Dennison*, a network entity does not transmit location dependent routing information to the terminal. Rather, in *Dennison* a network entity receives location information from the calling

terminal, determines a suitable route for a call based on this location information and then, if necessary, sends a command to establish a new connection based on this determination. No location dependent routing information is transmitted to the mobile terminals such that the terminals can route calls based on this location dependent routing information.

Withdrawal of the novelty rejection of claims 1-2, 7-12, 15, 17-19, 21, 23-25 and 28-29 based on *Dennison* is requested.

Silver discloses a similar arrangement to *Dennison* in that all location dependent routing information is retained within the network and is not provided to a terminal. Location information is provided from a mobile terminal to a network entity and the network entity retains user preferences regarding routing of calls based on the mobile terminal's location. The user's calls are routed to the user based on the user's call routing preferences and the location of the mobile terminal. Accordingly, *Silver* only discloses transmitting location information between the mobile terminal and the network. There is absolutely no disclosure or suggestion of storing location dependent routing information in a data storage and then providing a terminal with location dependent routing information stored in a data storage.

Withdrawal of the novelty rejection of claims 1, 3, 10, 13-14, 20, 22 and 24-25 based on *Silver* is requested.

Claim 16 depends from claim 15 and is patentable for at least the same reasons given above in connection with the applicant overcoming the 102 rejection of claim 15 and withdrawal of the obviousness rejection of claim 15 is requested.

Blakeney discloses a mobile terminal which maintains a list of communication systems, some of which are preferred systems and some of which are not preferred. The mobile terminal initially acquires a system according to, for example, the last used system. The mobile terminal then uses a system

identification received from the acquired system in order to determine its geographical region and uses the list to acquire a more desirable system in that geographical area. Again, there is absolutely no disclosure of storing location dependent routing information in a data storage and then providing a terminal with the location dependent routing information stored in the data storage such that a connection between the terminal and at least one other terminal can be established using location dependent routing information provided by the data storage.

Withdrawal of the obviousness rejection of claims 4-5 and 26-27 based on *Dennison* in view of *Blakeney* is requested.

Mazzarella describes an arrangement in which a mobile directory number assigned to a mobile station does not have to be changed when a user of the mobile station charges wireless service provider. This document does not appear to be of any relevance to the presently claimed invention. Withdrawal of the obviousness rejection of claim 16 based on *Dennison* in view of *Blakeney* as applied to claim 5 and further in view of *Mazzarella*.

The objections and rejections of the Office Action of June 25, 2007, having been obviated by amendment or shown to be inapplicable, withdrawal thereof is requested and passage of amended claims 1-29 to issue is earnestly solicited.

Respectfully submitted,

/Francis J. Maguire/

Francis J. Maguire
Registration No. 31,391
Attorney for Applicant

FJM/lk
WARE, FRESSOLA, VAN DER SLUYS
& ADOLPHSON LLP
755 Main Street, P.O. Box 224
Monroe, Connecticut 06468
(203) 261-1234